

Appl. No. 10/027,686  
Amdt. Dated 05/23/2006  
Reply to Office Action of February 23, 2006

### REMARKS

This Amendment is in response to the Office Action mailed February 23, 2006. In the Office Action, claims 1-20 were rejected under 35 U.S.C. §103(a). Applicants respectfully traverse these rejection and request reconsideration of the allowability of claims 1-20.

#### *Request for Examiner's Interview*

The Examiner is respectfully requested to contact the undersigned attorney listed below if after review, such claims are still not in condition for allowance. This telephone conference would greatly facilitate the examination of the present application. The undersigned attorney can be reached at the telephone number listed below.

#### *Rejection Under 35 U.S.C. § 103*

Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shah (U.S. Patent No. 6,292,832) in view of Still (U.S. Patent No. 6,718,390) and Beckerman (U.S. Patent No. 6,029,200). Applicants respectfully traverse the rejection because a *prima facie* case of obviousness has not been established.

As the Examiner is aware, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *See MPEP §2143; see also In Re Fine, 873 F. 2d 1071, 5 U.S.P.Q.2D 1596 (Fed. Cir. 1988).* Herein, the combined teachings of the cited references fail to describe or suggest all of the claim limitations.

For instance, as set forth in independent claim 1, Applicants respectfully submit that neither Shah, Still nor Beckerman, alone or in any combination, teach or suggest the translation of a plurality of *relative links* into a corresponding plurality of *absolute links* that...point to the *local domains associated with at least two* of the plurality of personal content directors. *Emphasis added.* Each absolute link is a *superset of a corresponding relative link by further including a domain name.* *Emphasis added.*

Applicants respectfully disagree with the Office Action that states that Beckerman teaches "a system that takes a hyperlink and responds with absolute links in the form of a reference file, that file contains a plurality of absolute links which correspond to one or more servers that contain the same resource." *See Page 3 of the Office Action.* Rather, Beckerman teaches the retrieval of a reference file that includes a list of resource specifiers that point to a potential source of streaming data content. *See column 5, lines 55-61 of Beckerman.* Beckerman is directed to teaching of the supply of multiple links for the same resource, which is inconsistent with the claimed invention where the absolute links are generated for RTT calculation purposes on subsequent accesses to retrieve content associated with the absolute links.

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Hence, the combined teachings of Shah, Still and Beckerman are directed to a process where links are modified to absolute links associated with a single local domain and the absolute links may be retrieved from a single reference file, which is contrary to the claimed invention that alters relative links into absolute links pointing to multiple local domains. *See page 12, lines 6-23 of the subject application.* In fact, Applicants respectfully submit that the combination of Shah, Still and Beckerman teaches away from the claimed invention in which the communications are focused to a centralized server (e.g., distributed director 506, server 206/210) and the retrieval of links from a reference file, which is not directed to modification of the relative links to absolute links involving at least two local domains as claimed. As defined in claim 1, the absolute link is a superset of the relative link by further including a domain name as set forth in an illustrative example on page 12 of the subject application.

With respect to independent claims 7 and 13, Applicants respectfully submit that neither Shah nor Still, alone or in combination, teach or suggest (1) the translation of a plurality of relative links into a corresponding *plurality of absolute links with a first absolute link pointing to a first local domain different from a local domain associated with the personal content director and a second absolute link pointing to a second local domain different from the local domain associated with the personal content director and the first local domain* (claim 7) or (2) a first *personal content director (PCD)* of the at least two PCDs that is adapted to translate the relative links associated with the web page into *corresponding absolute links that uniquely point to local domains associated with both of the at least two PCDs. Emphasis added.* For both of these claims, the absolute link is defined in the claim as a *superset of a relative link* of the plurality of relative links by further including the local domain name. *Emphasis added.* For instance, with respect to claim 13, the first and second absolute links are supersets of a first and second relative links by further including the first and second local domain names.

Applicants respectfully request that the Examiner withdraw the outstanding 35 U.S.C. §103(a) rejection as applied to independent claims 1, 7 and 13.

Furthermore, based on the dependency of claims 2-6, 8-12 and 14-20 on independent claims 1, 7 and 13, which are believed by Applicants to be in condition for allowance, no further discussion as to the grounds for traverse is warranted. Applicants reserve the right to present such arguments in an Appeal is warranted. Withdrawal of the §103(a) rejection as applied to claims 2-6, 8-12 and 14-20 is respectfully requested.

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### Conclusion

In view of the remarks made above, it is respectfully submitted that pending claims 1-20 define the subject invention over the prior art of record. Thus, Applicants respectfully submit that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: May 23, 2006

By

William W. Schaal

Reg. No. 39,018

Tel.: (714) 557-3800 (Pacific Coast)

12400 Wilshire Boulevard, Seventh Floor  
Los Angeles, California 90025

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